



BALISOK & KAUFMAN

March 18, 2019

VIA ECF

Hon. Carla E. Craig
U.S. Bankruptcy Judge
271 Cadman Plaza East
Brooklyn, NY 11201

Re: 4921 12th Avenue LLC (Case No.: 10-47256 (CEC))
Debtor's Emergency Application for a TRO

Dear Judge Craig:

We represent Debtor in the above-captioned action. Just this morning, this Court denied Debtor's motion seeking to enjoin further prosecution of the contempt hearing in the Galster Fraud Action. We respectfully submit this new application for an order addressing the primary relief we requested in the initial Order to Show Cause.

The bulk of the motion concerned not the contempt hearing against debtor's principal, but sanctions for the plaintiff's continued prosecution of the Galster Fraud Action generally despite knowing of the instant bankruptcy petition. It is undisputed that the plaintiff violated the automatic stay just by continuing to prosecute the lawsuit generally, regardless of whether this Court entertains the fact that pursuing the contempt hearing against debtor's principal also violated the stay.

We thus respectfully submit our application to again ask this Court to address sanctions for prosecution of the Galster Fraud Action as such prosecution related to Debtor itself. We thank the Court for taking the time to consider this emergency application. Of course, should the Court have any questions, we are available at Your Honor's convenience.

Respectfully submitted,

/s/ Joseph Y. Balisok

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cc. All counsel of record (via ECF)
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